

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Hubert Williams,

PLAINTIFF,

v.

Marcus Dorsey, Red Roof Inns, Inc.,
WHG SU Columbia, LLC,

DEFENDANTS.

C/A No. 3:22-cv-01330-MGL

NOTICE OF REMOVAL

Defendants Red Roof Inns, Inc. and WHG SU Columbia, LLC, file this Notice of Removal, stating as follows:

1. Jurisdiction is proper in this Court under 28 U.S.C. § 1332.
2. The Affidavit of Defendant's counsel, Taylor J. Stewart, Esq., is submitted as Exhibit A in support of this Notice of Removal.
3. This case is a civil action involving Plaintiff Hubert Williams's claims against Defendants alleging assault, battery, intentional infliction of emotional distress, negligent hiring, negligent retention, negligent supervision, vicarious liability, and punitive damages.
4. In response to Local Rule 83.IV.02, this action was commenced in the Court of Common Pleas for Richland County in South Carolina on March 22, 2022 in case number C/A No. 2022CP4001459. Defendants Red Roof Inns, Inc. and WHG SU Columbia, LLC were served on March 28, 2022 with the Summons and Complaint. The served documents are attached in Composite Exhibit B. Defendant Marcus Dorsey has not been served.
5. Plaintiff's Complaint discloses his intent to seek damages in excess of \$75,000. (See generally, Complaint, attached within composite Exhibit B.)

6. Plaintiff Williams alleges that he is a citizen of South Carolina domiciled in Richland County, South Carolina. (Compl. ¶ 1).

7. Defendant Red Roof Inns, Inc. was and is a Delaware corporation with its principal place of business in New Albany, Ohio.

8. Defendant WHG SU Columbia, LLC was and is a citizen of Delaware, Texas, and California.

9. The basis for this Court's jurisdiction is Diversity Jurisdiction under 28 U.S.C § 1332, as the parties have complete diversity of citizenship. Moreover, Defendants are not citizens of the State of South Carolina nor would removal otherwise violate 28 U.S.C. § 1441(b)(2).

10. Copies of all process, pleadings, and orders served upon Defendants and such other papers that are attachments as required by 28 U.S.C. § 1446 and local court rules are attached in Defendants' Composite Exhibit B.

11. Pursuant to 28 U.S.C. § 1446(d), Defendant has provided written notice to all adverse parties and has filed a copy of this Notice of Removal with the Clerk of the Court for the Court of Common Pleas for Richland County, South Carolina. (A copy of the Notice of Filing of Notice of Removal to opposing counsel is attached as Exhibit C; a copy of the Certification and Notice of Notice of Removal to be filed with the Richland County Clerk of Court is attached as Exhibit D).

12. Counsel for Defendant certifies this is the proper division assignment for this matter as required and described in Local Rule 3.01 of this District.

WHEREFORE, Defendant respectfully submits this matter to this Court's jurisdiction.

Respectfully submitted this 26th day of April, 2022.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Taylor J. Stewart _____

Taylor J. Stewart
Fed Bar No.: 13451
SC Bar No.: 101974

*Counsel for Defendants Red Roof Inns, Inc.
and WHG SU Columbia, LLC*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Notice of Removal** has been mailed to all parties to this action via U.S. Mail, addressed as follows:

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Brett Woron
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Counsel for Plaintiffs

This 26th day of April, 2022.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Taylor J. Stewart
Taylor J. Stewart
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